



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, NY 10007

July 28, 2023

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records, et al. v. U.S. Department of Veterans Affairs*, 18 Civ. 8449 (PAE)

Dear Judge Engelmayer:

This Office represents the United States Department of Veterans Affairs (the “VA”) in this Freedom of Information Act (“FOIA”) case. On behalf of the parties, we write pursuant to this Court’s Order, which directed the parties to file a joint update on the status of the two prior outstanding tasks of the case—the completion of the VA’s final production, and the parties’ effectuation of the stipulation and order for plaintiffs’ claims for attorneys’ fees. *See* Dkt. No. 55.

On behalf of the parties, we sincerely apologize for failing to previously update the Court on these matters. In March 2022, the VA completed its final production to Plaintiffs. In addition, in June 2022, the VA fulfilled its obligation pursuant to the Stipulation and Order of Dismissal of Plaintiffs’ Claim for Attorneys’ Fees and Costs, Dkt. No. 52. The parties respectfully inform the Court that there are no further outstanding tasks in this case, and no remaining disputes between the parties.

We thank the Court for its consideration of this matter, and again apologize for failing to provide the required update on an earlier date.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Charles S. Jacob
CHARLES S. JACOB
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, NY 10007
Tel: (212) 637-2725
charles.jacob@usdoj.gov
Counsel for the VA

BELDOCK, LEVINE & HOFFMAN
LLP

/s/
By: _____
David B. Rankin
99 Park Avenue, Penthouse Suite
New York, NY 10016
Telephone: (212) 490-0400
Attorneys for Plaintiffs